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7  
8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA  
11  
12 SAN FRANCISCO DIVISION

13 IN RE: CRT ANTITRUST LITIGATION

Master File No. CV-07-5944-SC  
MDL No. 1917

14 This Document Relates to:

**CLASS ACTION**

15 ALL DIRECT PURCHASER CLASS  
16 ACTIONS

17  
18 DECLARATION OF JOEL C.  
19 MEREDITH IN SUPPORT OF MOTION  
20 FOR ATTORNEYS' FEES,  
21 REIMBURSEMENT OF EXPENSES, AND  
22 INCENTIVE AWARDS  
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Master File No. CV-07-5944-SC; MDL 1917

DECLARATION OF JOEL C. MEREDITH IN SUPPORT OF MOTION FOR ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES. AND INCENTIVE AWARDS

1 I, Joel C. Meredith, declare and state as follows:

2 1. I am a member of the law firm of Meredith Cohen Greenfogoel & Skirnick, P.C. I  
3 submit this declaration in support of Direct Purchaser Plaintiffs ("DPP") joint application for an  
4 award of attorney fees in connection with the services rendered in this litigation. I make this  
5 Declaration based on my personal knowledge and if called as a witness, I could and would  
6 competently testify to the matters stated herein.

7 2. My firm has served as counsel to Wettsteins and Sons, Inc. d/b/a Wettsteins, the  
8 Stroud Group, Inc. and the class throughout the course of this litigation. The background and  
9 experience of Meredith Cohen Greenfogoel & Skirnick, P.C. and its attorneys are summarized in  
10 the *curriculum vitae* attached hereto as Exhibit 1.

11 3. Meredith Cohen Greenfogoel & Skirnick, P.C. has prosecuted this litigation solely  
12 on a contingent fee basis, and has been at risk that it would not receive any compensation for  
13 prosecuting claims against the defendants. While Meredith Cohen Greenfogoel & Skirnick, P.C.  
14 devoted its time and resources to this matter, it has foregone other legal work for which it would  
15 have been compensated.

16 During the pendency of the litigation, Meredith Cohen Greenfogoel & Skirnick, P.C.  
17 performed the following work: During the pendency of the litigation, at the direction of lead  
18 counsel, Meredith Cohen Greenfogoel & Skirnick, P.C. worked primarily with plaintiffs  
19 Wettsteins and the Stroud Group, Inc. on the collection and production of documents, amended  
20 complaint and other matters.

21 5. Attached hereto as Exhibit 2 is my firm's total hours and lodestar, computed at  
22 historical rates, from May 9, 2008 through July 31, 2014. This period reflects the time spent after  
23 the appointment of Lead Counsel in the litigation. The total number of hours spent by Meredith  
24 Cohen Greenfogoel & Skirnick, P.C. during this period of time was 40.75 hours with a  
25 corresponding lodestar of \$25,135.00. This summary was prepared from contemporaneous, daily  
26 time records regularly prepared and maintained by my firm. The lodestar amount reflected in  
27 Exhibit 2 is for work assigned by Lead Class Counsel, and was performed by professional staff at  
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1 my law firm for the benefit of the Direct Purchaser Plaintiff ("DPP") Class.

2 6. The hourly rates for the attorneys and professional support staff in my firm  
3 included in Exhibit 2 are the usual and customary hourly rates charged by Meredith Cohen  
4 Greenfogoel & Skirnick, P.C.

5 7. My firm has expended a total of \$525.80 in unreimbursed costs and expenses in  
6 connection with the prosecution of this litigation. These costs and expenses are broken down in  
7 the chart attached hereto as Exhibit 3. They were incurred on behalf of Direct Purchaser Plaintiffs  
8 by my firm on a contingent basis, and have not been reimbursed. The expenses incurred in this  
9 action are reflected on the books and records of my firm. These books and records are prepared  
10 from expense vouchers, check records and other source materials and represent an accurate  
11 recordation of the expenses incurred.

12 8. Meredith Cohen Greenfogoel & Skirnick, P.C. paid a total of \$ \$10,000.00 in  
13 assessments for the joint prosecution of the litigation against the defendants.

14 9. I have reviewed the time and expenses reported by my firm in this case which are  
15 included in this declaration, and I affirm that they are true and accurate.

16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct. Executed on July 31, 2014 at Philadelphia, PA.

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20 Joel C. Meredith  
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# Exhibit 1

**BIOGRAPHY OF  
MEREDITH COHEN GREENFOGEL & SKIRNICK, P.C.**

Meredith Cohen Greenfogel & Skirnick, P.C., with offices in Philadelphia and New York City, has been recognized by the bench and the bar for its expertise in complex, multi-party litigation. In discussing the quality of legal representation by two of its named partners and its predecessor firm, the Court, in Bagel Inn, Inc. v. All Star Dairies, Inc., et al., 539 F. Supp. 107 (D.N.J. 1982), an antitrust class action, stated:

I do not know whether less able counsel could have obtained this favorable result. I am certain, however, that the quality of legal services in this case was of a high caliber. Id. at 112.

and

Even in my experience with counsel of comparable skill and experience, I have rarely seen a complex matter involving difficult questions of liability and damages such as this handled so expeditiously. I have little doubt that this case harbored the potential to become another in the long string of protracted, indeed interminable, proceedings that have given new meaning to the concept of complex litigation. Although there was extensive discovery involved in this matter, few disputes arose. Most pretrial controversies were resolved by stipulation. It is fair to say that absent counsel's expertise as exhibited in this proceeding, many more hours would have been expended and significantly greater expenses would have been incurred in prosecuting this case without increasing the chances for a more favorable recovery. Id. at 116.

Steven J. Greenfogel is a 1973 graduate of Temple Law School and is a shareholder in the firm. From March, 1977 to April, 1980 he was Chief of the Antitrust Division of the office of the Attorney General of the Commonwealth of Massachusetts. Mr. Greenfogel has been co-lead counsel in In re Chain Link Antitrust Litigation, Master File CLF-1 (D. Md.) and In re Industrial Silicon Antitrust Litigation, 95-2104 (W.D.Pa.) and has had a significant role in, inter alia, the

following multidistrict class action litigations: In re Infant Formula Antitrust Litigation, Master File No. MDL 878 (N.D. Fla.); In re Carbon Dioxide Antitrust Litigation, MDL No. 940 (M.D. Fla.); Cumberland Farms v. Browning-Ferris Industries, Inc., C.A. No. 87-3717 (E.D. Pa.); Superior Beverage/Glass Container Consolidated Pretrial, Case No. 89 C 5251 (N.D. Ill.); In re Chlorine and Caustic Soda Antitrust Litigation, Master File No. 86-5428 (E.D. Pa.); In re Records and Tapes Antitrust Litigation (N.D. Ill.); and In re Chicken Antitrust Litigation (N.D. Ga.).

Daniel B. Allanoff is a 1986 graduate of Temple University Law School and is an officer and shareholder in the firm. He is admitted to practice in the Supreme Court of the Commonwealth of Pennsylvania and is a member of the Bars of the Courts of Appeals for the Third and Eleventh Circuits and the Eastern District of Pennsylvania. During his twenty-one years of experience, Mr. Allanoff has had a substantial role in numerous individual and multi-district complex class actions, including antitrust litigation and consumer protection cases. He was antitrust counsel for Maurice Clarett in Clarett v. NFL, (OC-cv-7441 (S.D.N.Y.)). Other cases in which he has had significant roles include In re Florida Milk Antitrust Litigation, CA 93-1077 (M.D. Fla.); In re High Fructose Corn Syrup Antitrust Litigation, MDL No. 1087 (C.D. Ill.); X-Ray Film Antitrust Litigation, No. CV 93 5904 (CPS) (E.D.N.Y.); In re Commercial Tissue Antitrust Litigation, MDL No. 1189 (N.D.Fla.); In re NASDAQ Market-Makers Antitrust Litigation, MDL 1023; In re Baby Food Antitrust Litigation, Master File No. 92-5495 (NHP)(D.N.J.); In re Infant Formula Antitrust Litigation, Master File No. MDL 878 (N.D. Fla.); Cumberland Farms, Inc. v. Browning-Ferris Industries, Inc., C.A. No. 87-3717 (E.D. Pa.); Superior Beverage/Glass Container Consolidated Pretrial, Case No. 89 C 5251 (N.D. Ill.); and In

re Steel Drums Antitrust Litigation, C.A. No. C-1-91-208 (S.D. Oh.).

# Exhibit 2





# Exhibit 3

In re Cathode Ray Tube (CRT) Antitrust Litigation  
Meredith Cohen Greenfogel & Skirnick, P.C.  
Reported Expenses Incurred on Behalf of DPPs

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Court Fees (filing, etc.)	
Experts/Consultants	
Federal Express	\$16.49
Transcripts (Hearing, Deposition, etc.)	
Computer Research	\$8.31
Messenger Delivery	
Photocopies – In House	\$126.20
Photocopies – Outside	
Postage	
Service of Process	
Telephone/Telecopier	\$2.01
Travel (Airfare, Ground Travel, Meals, Lodging, etc.)	\$372.79
<b>TOTAL:</b>	<b>\$525.80</b>